

MEMORANDUM

TO: Superintendents, Principals, CFP Team Leaders, and Business Managers
FROM: Deb Quackenbush, Division Director- General Supervision & Monitoring
SUBJECT: Title I and Prekindergarten Programs
DATE: 12/22/14

Last May, Gov. Shumlin signed Act 166, the Universal Prekindergarten bill, which entitles all 3, 4, and 5-year-old children not attending kindergarten to 10 hours of publicly funded high-quality prekindergarten education in a prequalified program. Those programs may be in a public school or private pre-qualified preschool setting.

Act 166 will not be fully implemented until the guiding regulations are effective. These regulations (state administrative rules) are being developed and will take effect on July 1, 2016. School districts that want to initiate universal access for the 2015-2016 school year may do so. However, Act 166 will not be fully implemented until July 1, 2016.

What does this mean for school districts that have used Title I funds for preschool education? This will depend upon whether a school district chooses to provide universal access in 2015-2016, or if the district waits until the law is implemented, on July 1, 2016. For districts that decide to wait for the implementation date of July 1, 2016, the use of Title I funds for preschool remains the same as in past years (since the passage of Act 62 of 2007).

The rest of this memo describes what is different in the way Title I funds may be used by school districts who choose to implement in the 2015-2016 school year, and will apply to all school districts in 2016-2017 school year.

School districts that choose to provide universal access pursuant to Act 166 of 2014 for the 2015-2016 school year may not use Title I funds for any expenses associated with the first ten hours of services as that would be considered supplanting. School districts may use Title I funds for costs associated with the provision of preschool education over the mandated 10 hours as long as those costs were not previously paid for with state or local funds.

Almost all of the preschool costs previously allowed with Title I will be affected. Some examples follow:

- teacher salaries – costs associated with the first 10 hours of preschool must be covered with state and local funds;
- LEA Early Education Coordinator's salaries – costs associated with coordinating the first 10 hours of preschool AND costs associated with other activities to meet the mandates of the law must be covered with state and local funds;
- materials & supplies – costs associated with the provision of the first 10 hours of preschool must be covered with state and local funds, unless the materials are supplemental to the basic program; and
- building Expenses – costs, like rent & maintenance, associated with the provision of the first 10 hours of preschool must be covered with state and local funds.

The chart on the following page outlines the implications for Title I funds in the implementation of Vermont Act 166 Prekindergarten Education for those implementing in 2016, and for all districts in 2017.

If you have questions about the allowable Title I costs, please call Mary Mulloy at 802-479-1226 or Beth Meyers at 802-479-3112.

Act 166	Local /State Funds	Title I Funds	Comments
<p><u>Identification and Enrollment</u> Each district will establish enrollment procedures for prekindergarten children. Each district will notify parents and guardians of the right to and availability of publically funded prekindergarten education and the enrollment procedures through a variety of sources adequate to inform parents and guardians throughout the district.</p>	Yes	No	
<p><u>Instruction</u> Implement a developmentally appropriate curriculum which is aligned with Vermont’s Early Learning Standards.</p> <p>Provide prekindergarten education for a minimum of 10 hours/week for 35 weeks per academic year for all 3, 4, and 5 year olds not yet in kindergarten.</p> <p>To meet this requirement:</p> <ul style="list-style-type: none"> • supervisory unions or schools may provide a public school prekindergarten program; • pay tuition (to the amount calculated per rules by the Agency of Education) to prequalified private prekindergarten education program; or • a combination of both (the SU or the school offers a public school option but a parent chooses to place their child in a prequalified private program). 	Yes	No	<p>Title I may be used to supplement the public 10 hours per week prekindergarten program by providing an extended day/year program (e.g., providing an additional 10 hours per week, prekindergarten programming beyond the school’s academic year). This is dependent on how the public prekindergarten program is operated:</p>
	Yes	No	<ul style="list-style-type: none"> • if in a public supervisory union or district program, funds may only be used for an identified Title I caseload unless all the elementary schools are Title I schools and operated as Title I schoolwide programs.
	Yes	Maybe	<ul style="list-style-type: none"> • if in a public school that operates as a Title I schoolwide program, funds may benefit all prekindergarten students. • if in a public school that operates as a Title I targeted assistance program, Title I funds may only benefit the Title I caseload students. <p>If Title I funds are used, the whole program must meet all Title I requirements. Title I funds may not be used to pay for programming that was previously paid for with state or local dollars. Title I funds may be used to provide supplemental instruction to</p>

			<p>prekindergarten students that are struggling academically (remediation types of services).</p> <p>Title I funds may supplement the instructional materials if the prekindergarten program is in a Title I schoolwide school.</p> <p>Title I funds may not be used to supplement additional hours at a private prekindergarten program unless the school or LEA has contracted (using state and local procurement procedures) with a private provider to provide Title I students with extra services over and beyond the 10 hours the state requires.</p>
<p><u>Staff Qualifications</u> In addition to meeting all applicable early childhood program licensing requirements of the VT Dept. of Children & Families, teachers must meet the following qualifications:</p> <ul style="list-style-type: none"> • in a district or public school operated program, hold a valid VT educator license with an endorsement in early childhood education or early childhood special education; or • in a private, prequalified prekindergarten education program, employ or contract with the services of at least one teacher (who works during the 10 hours of prekindergarten program) who holds a valid VT educator license with an endorsement in early childhood education or early childhood special education. 	Yes	N/A	<p>In a Title I schoolwide school, all teachers, including prekindergarten education teachers, must be highly qualified for their assignment. All paraprofessionals must meet the highly qualified definition in NCLB and if paid with Title I must be a licensed teacher.</p> <p>In a Title I targeted assistance program, only paraprofessionals paid for with Title I funds must meet the highly qualified paraprofessional definition in NCLB and be a licensed teacher. They must also work under the direct supervision of a highly qualified teacher and in close proximity to that teacher.</p>
<p><u>Professional Development for Staff</u></p>	Yes	Yes	<p>Title I funds may be used to support ongoing training and professional development to assist teachers in meeting the intent of Title I (increasing the academic achievement of eligible students).</p>

<p><u>Assessment</u> Conduct child development assessments of each child enrolled using the assessment tool approved by the Agency of Education at least twice per year.</p>	Yes	No	
<p><u>Data Gathering & Reporting</u> Complete reports for enrollment, attendance, child assessment, costs of prekindergarten education, finances, and other areas as required by state law and the Agency of Education.</p>	Yes	No	
<p><u>Parent Involvement</u> Provide opportunities for effective parental involvement and participation. These opportunities may include involvement in program development, policy work, program evaluation, curriculum development, and helping in the class.</p> <p>Provide parent or guardians with a report of their child’s developmental progress at least twice per year.</p>	Yes	Maybe	Title I schools may include parents of prekindergarten children in parental involvement activities help in a Title I school operating as a schoolwide program.
<p><u>Transition Services</u></p>	Yes	Yes	Title I funds may be used for services and activities to assist prekindergarten children in a successful transition from prekindergarten programs to elementary school programs. In a Title I schoolwide school, all the students may be served but in a targeted assistance program, only the eligible Title I students may receive transition services.